

**REMARKS****I. Status of the Claims:**

Claims 23-37 are currently pending.

**II. Information Disclosure Statement:**

As previously noted, Information Disclosure Statements were filed in the application on March 12, 2004 and August 26, 2005 as reflected in PAIR. Upon review of the Office Action, the Applicants noticed that the reference Shiozawa (along with its English translation) cited in the OTHER DOCUMENTS section on the PTO Form 1449 for the IDS of August 26, 2005 was not initialed. The Office Action also did not include any initialed copies of the PTO Form 1449 for the IDS of March 12, 2004. Accordingly, as previously requested, the Applicants would greatly appreciate consideration of these IDSs (if not already considered) and the references cited thereon, and a copy of the initialed Form PTO 1449 reflecting consideration of all the references cited in these IDS.

**III. Rejections under 35 U.S.C. § 103:**

Claims 23-24, 26-29 and 31-34 and 36-37 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Nam et al. (US 6,138,163) in view of Bowker et al. (US 2001/0039615). Claims 25, 30 and 35 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Nam and Bowker in view of Segur (US 6,212,550). The Applicants respectfully traverse these rejections.

Claim 23 is directed to a relay apparatus having a connection management device adapted to make a connection with the server having the image sensing device via Internet, to get the video stream data from the server having the image sensing device, and to deliver video

stream data to a first client in response to a request from the first client via Internet, and a memory control device adapted to store the video stream data from the server having the image sensing device, in a buffer memory. The connection management device delivers the video stream data stored in the buffer memory to the first client without starting a new connection between the relay apparatus and the server, in case that a connection between the relay apparatus and the server having the image sensing device to deliver the video stream data to a second client different from the first client has been established.

That is, video stream data stored in the buffer memory is delivered to the first client without starting a new connection between the relay apparatus and the server where a connection between the relay apparatus and the server (having the image sensing device to deliver the video stream data to a second client different from the first client) has been established. As claimed, this delivery of the video stream data to the first client occurs under two conditions (1) without starting a new connection between the relay apparatus and the server and (2) where a connection has been established between the relay apparatus and the server for a different second client.

Such an arrangement for example eliminates the need to establish another connection where a connection has already been established for another client and the video stream data is obtained through that connection and stored in the buffer. As such, this arrangement, for example, reduces the number of communications with the video server and improves the execution efficiency such as when video acquisition requests from a plurality of video clients are received. See e.g., pp. 20-21 (Video Deliverer 117).

Nam shows a media server and real time delivery method between different networks. As acknowledged by the Examiner, Nam is silent as to the above delivery of video

stream data under the two conditions. The remaining Bowker reference does not appear to remedy the deficiencies of the Nam teachings.

Bowker simply shows a broker application server (e.g., BAS 20) which facilitates communications between two or more parties through a translation service. In general, the BAS receives a packet (or multiple packets) from a sender (e.g., sender 22) destined to a particular receiver, performs transcoding of the packet to the preferred format of the destination receiver, and routes the transcoded packet to the receiver. In the Bowker system, the packets are sent from a sender to a particular receiver. Thus, Bowker is also silent as to the delivery of video stream data from the buffer under the two conditions, e.g., (1) without starting a new connection between the relay apparatus and the server and (2) where a connection has been established between the relay apparatus and the server for a different second client.

Furthermore, in the Office Action, the Examiner does not properly address the claim language as a whole, particularly with respect to the delivery of the video stream data and the conditions upon which this delivery occurs. The Office Action addresses this claim language in an arbitrary piecemeal fashion. The cited references also do not contemplate the exemplary problems (noted above) which are addressed by the arrangement of claim 23.

Accordingly, claim 23 is distinguishable over the cited references Nam and Bowker, individually or in combination. For similar reasons, claims 28 and 33 are also distinguishable over the cited references.

Furthermore, various dependent claims 26 and 27 (which depend from claim 23) further define the conditions of delivery of video stream data stored in the buffer memory to the first client where (1) a request each from the first client and second client is received within a

predetermined period or (2) a request from the first client is received within a predetermined period from receiving a request from the second client.

The cited references, individually or in combination, are silent as to these aspects of claim 26 and 27 in the context of the claimed arrangement as a whole. For example, Nam shows a mediate server and real time delivery method between different networks, and Bowker appears to simply deal with transcoding of packets sent from a sender to a particular receiver. The Office Action also does not adequately address these further claimed aspects. Accordingly, claims 26 and 27 (as well as claims 31, 32, 36 and 37) are believed to be further distinguishable over the cited references.

**CONCLUSION**

Based on the foregoing remarks, the Applicants respectfully request reconsideration and withdrawal of the rejection of claims and allowance of this application.

**AUTHORIZATION**

The Commissioner is hereby authorized to charge any additional fees which may be required for consideration of this Amendment to Deposit Account No. 13-4500, Order No. 1232-4473US1.

In the event that an extension of time is required, or which may be required in addition to that requested in a petition for an extension of time, the Commissioner is requested to grant a petition for that extension of time which is required to make this response timely and is hereby authorized to charge any fee for such an extension of time or credit any overpayment for an extension of time to Deposit Account No. 13-4500, Order No. 1232-4473US1.

Respectfully submitted,  
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Dated: \_\_\_\_\_

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